

The Examiner alleges (Page 4, lines 1-2 of the Office Action) that Plantec teaches a system "for use to determine by e-mail survey..." Applicant respectfully submits that the Examiner's statement is erroneous. The Plantec reference does NOT teach or suggest any kind of e-mail survey and therefore rejection of Claims 35-36 should be withdrawn.

Further, the Plantec reference does NOT teach or suggest Applicant's capture and storage of experiences. The Examiner cites Plantec column 26, line 19-20 where the words "user experience" appear in the Plantec reference. However, the context of these words clearly shows that the Plantec reference merely alleges that "reduced download times provided a better user experience". The Plantec reference provides NO teaching about capture and storage of experiences in a database. Applicant respectfully submits that the Examiner has not established a prima facie case of obviousness for Applicant's claims and therefore rejection of Claims 43-63 should be withdrawn.

Further, NONE of the references teach Applicants set of *natural-language terms to be rated as to relevancy to each subject*. The Examiner acknowledges that the Plantec reference does not teach Applicant's relevancy limitations. Goldstein does not teach Applicant's relevancy limitations either. On page 4, line 18, of the office action the Examiner alleges that "Goldstein teaches relevancy information at para 0017 and 0083." However Goldstein's teachings in paragraph 0017, "...insuring that they receive the most *relevant* offers of goods..." and paragraph 0083, "There might also be a detailed explanation on how My-e-surveys 150 "Float" or any other *relevant* information." reveals that the Goldstein reference merely contains the word "relevant" and clearly does not teach Applicant's Claim limitation of *natural-language terms to be rated as to relevancy to each subject*. In other words, paragraphs 0017 and 0083 of the Goldstein reference are irrelevant to Applicant's Claims. Applicant respectfully submits that the Examiner has not established a prima facie case of obviousness for Applicant's claims and therefore rejection of Claims 35-36 and 43-85 should be withdrawn.

Further, Applicant disagrees with the Examiner that it would have been obvious to combine the references as suggested by the Examiner. Paragraph 0002 of the Goldstein reference does not provide teaching or suggestion to combine the references as suggested by the Examiner. The suggestion to combine the references is the result of impermissible hindsight on the part of the Examiner.

Finally, Applicant's priority date, February 10, 2000, precedes the Goldstein reference. If the Examiner persists with rejections, Applicant will submit an Affidavit under 37 CFR 1.131. Applicant submits that although the Goldstein reference might claim a priority dated a couple months earlier than Applicant's filing date, Applicant can still overcome the reference by submitting an Affidavit under 37 CFR 1.131.

Applicant repeats the previous argument regarding "natural language." Applicant respectfully submits that Plantec does not teach "natural language" as defined by, and used in, Applicant's specification. As the Examiner points out, the Examiner must interpret the limitations in light of and consistent with the specification. Applicant requests a telephonic interview to discuss clarifying the definition and meaning of "natural language."

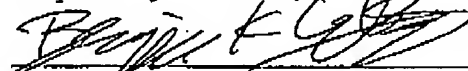
Applicant believes that all Claims are allowable with respect to 35 USC §103, and respectfully request that all such rejections be withdrawn.

For the reasons given above, and after careful review of all the cited references, Applicant respectfully submits that none of the cited references nor any combination of the cited references will result in Applicant's claimed invention in the present Claims. But even if any such combination might arguably result in such claimed invention, it is submitted that such combination would be non-obvious and patentable.

If there are any fees incurred by this Amendment Letter, please deduct them from our Deposit Account NO. 50-1887.

Applicant respectfully requests (not as a matter of form but as a special request in this case) that the Examiner, after having an opportunity to review this Office Action Response, grant a telephonic interview to Applicant's undersigned agent in order to discuss Applicant's response to the Examiner's Office Action (before the Examiner prepares a next office action), to attempt to reach mutual understanding and clarify any outstanding issues. Applicant respectfully requests that the Examiner call Applicant's undersigned agent at 602-263-9200 to schedule a telephonic interview at least two business days in advance to allow the Applicant's undersigned agent time to prepare and schedule the interview. For telephonic scheduling purposes, Applicant's agent is located in Arizona, in the Mountain Standard Time zone.

Respectfully submitted,



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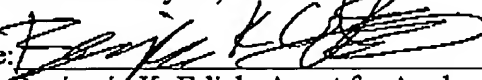
Date: February 28, 2006

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on February 28, 2006.

Date of Sig. February 28, 2006

Name of Registered Representative:

Signature:



Benjamin K. Erlick, Agent for Appl.